REMARKS

Claims 1, 7, 10, 11, 12, 16, 17, 27, 28, 32, 33, 34, 41 have been amended. Claim 2 has been cancelled. Claims 50 to 53 are newly added. Reconsideration of the claim, as amended, is respectfully requested.

Amendments to the Specification

The specification has been amended to correct certain obvious mistakes. In amending the specification, no new matter is being added. Rather, the amendments are merely to correct certain errors that are obvious in the context of the specification as follows:

Table 3	• The description of item 'searchterm' is corrected as per Table 2. • The description of item 'adapterid' is corrected as per Table 2. • The description of item 'userid' is corrected as per Table 2. • The description of item 'createdonday' is amended to match its item name.
Table 4	• The item 'adaptedid' is not correct and should instead read 'referrerurl' to match the description given. • The description of item 'createdonday' is amended to match its item name.

Claim rejections – 35 USC 102

Claims 1-2, 5-17, 24-25, 27-35, 41-42, and 45-49 have been rejected under 35 USC 102 as being anticipated by US 2001/0037325 (Biderman et al). The rejection of claim 1 will first be addressed.

As amended, claim 1 now includes the steps of:

storing a search trail corresponding to the search query, said search trail including at least one trail step corresponding to two consecutively accessed pages that are accessed by the client via a hyperlink between the pages;

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Support for this amendment may be found at least at the following locations in the specification: at page 8, lines 16-17 and lines 22 to 29, at page 12, line 31 to page 13 line 4, and Table 3 on page 14, and Table 4 on page 15.

Applicant submits that Biderman does not disclose this feature. More specifically, Biderman, describes, at Figure 3, a table listing sites accessed by a browser. These sites are listed according to a 'time' field. Although Biderman stores data relating to drawing and searching history, this is different than the features now claimed in claim 1. Specifically, claim 1 provides that each trail step corresponds to <u>two consecutively accessed pages that are accessed by the client via a hyperlink between the pages</u>. This arrangement does not accord with Figure 3 of Biderman, at least because each line of the Biderman table corresponds to only a single accessed page.

In particular, there is no teaching or suggestion in Biderman that <u>consecutively accessed pages that are accessed by the client via a hyperlink between the pages</u> are treated in any way differently to pages accessed in other fashions. This is evidenced by Figure 3 of Biderman which lists data relating to sites accessed by a browser within a given time period.

The applicant also submits that it would be improper to read Biderman to imply that pairs of adjacent rows in the table of Figure 3 are associated by a hyperlink. It is <u>not possible</u> to determine the relationships between the pages accessed in Biderman. For example, one might ask when, considering Figure 3, "How did the user come to visit <u>www.taxstuff.com/</u> at 17:30:30?". There are several possible and highly plausible answers, including:

the user <u>clicked on a link that was present in the Yahoo page</u> that was delivered at 17:30:05;

the user <u>typed the address</u> 'www.taxstuff.com' into his or her browser

the user <u>clicked on a link that was present in some other earlier accessed page</u>, such as <u>www.microsoft.com/developer/mssql/</u>

the user <u>has 'www.taxstuff.com' as his or her homepage and pressed the Home button</u> on the browser;

the user <u>selected 'www.taxstuff.com' from his or her Bookmarks;</u>

the user <u>selected 'www.taxstuff.com' from their browser History list;</u>

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the user clicked on a link in some other document, such as an email, that pointed to 'www.taxstuff.com'

The Applicant observes that another page of the site www.taxstuff.com, namely www.taxstuff.com/calc98.htm, is visited at 17:39:10. How the user arrived at the page is similarly unclear. It is submitted that, in addition to the possibilities described above, the user the user might also have:

followed a link from the Altavista page delivered at 17:38:32pm;

followed a link from the www.taxstuff.com homepage visited at 17:30:30.

Applicant observes that it is tempting to imagine that that pairs of adjacent rows in Figure 3 of Biderman might be associated by a hyperlink. That is, that in Figure 3 of Bidermanm, the fact of two pages being accessed consecutively in time provides information about a hyperlink between the pages.

If this approach were adopted, it would imply that the user arrived at www.yahoo.com via a hyperlink from www.microsoft.com/developer/mssql/. This conclusion may, or may not be correct; Applicant observes that the fact cannot be determined from the disclosure of Biderman.

In contrast with the method of claim 1, when a search trail includes at least one trail step corresponding to two consecutively accessed pages that are accessed by the client via a hyperlink between the pages, the search trail records an unambiguous description of a user's behaviour in navigating to other websites via hyperlinks after receiving search results.

More generally, Biderman has a different focus to claim 1 of the present invention – it seeks to associate users with each other on the basis of pages visited and their search interests. In such a context how a user arrives at a page is not important This is different to the present invention of claim 1 which seeks to determine user behaviour following a search (by collecting search trails comprising search steps of the type claimed) so that this information can be used to facilitate future web searching by the user and other users. The user behaviour, as embodied in the links followed by a user, is used in the present invention to determine, inter alia, which sites are ultimately considered useful to the user and possible other users.

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Hence, claim 1 which has been amended to include such a limitation is distinguishable and in condition for allowance. Claims 5-17, 24-25, 27-31 and 49 depend from claim 1 and are distinguishable for at least the same reasons.

Claims 5, 6 and 49

Claim 49 provides that the step of detecting submission of a search query to at least one search engine includes detecting submission of a completed form object. In the Office Action, reference is made to paragraphs [0062] and [0063] as disclosing this feature.

Applicant respectfully disagrees. The skilled person would understand the words 'completed form object' as having a meaning that is not embraced by the Applet described at the relevant paragraphs of Biderman. In particular, the Applicant submits that the 'form object' would be understood in the context of the discussion at page 9, lines 18 to 29 of the specification. This is clearly different from the Applet comprising a text box 41 described at paragraph [0062]. The Applicant respectfully submits that paragraph [0063] is not relevant to the feature of detecting submission of a completed form object. Hence, claim 49 is distinguishable for this additional reason.

The Office Action also cites the same paragraphs of Biderman for the features of locating form objects in an object model of content served to a client; and adding a routine to each form object to enable interception of the completed form object upon submission, found in claim 5. Nowhere in these paragraphs is there a disclosure of an embodiment that locates form objects in an object model of content served to a client. Moreover, there is certainly no disclosure of adding a routing to each form object to enable interception of the completed form object upon submission. Rather, what is disclosed by Biderman is the use of an Applet, which has a well understood and different meaning to the skilled person than that which is presently claimed.

The Office Action goes on to rely on the same paragraphs of Biderman as disclosing the step of locating all form objects in a document object model of content served to a client is carried out after the content has been served to the client (claim 6). This is not correct as

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a consequence of the reason given above in relation to claim 5. Hence, claims 5 and 6 are distinguishable for these additional reasons.

Claim 7

In relation to claim 7, the Office Action relies on Biderman for the feature that the content is an HTML document, and all form objects in a document object model of the HTML document are located once a DocumentComplete event occurs. There is no disclosure of these features at paragraph [0062] or [0063] as asserted by the Examiner. Those paragraphs describe a GUI downloaded within an **applet** from the web server 43 to the client machine. Upon clicking the search command key, each of the selected search engines performs a search for the specified key words and displays the results in a respective window opened by the user's browser. There is no disclosure that the content is an HTML document. There is no disclosure that all form objects in a document object model of the HTML document are located once a DocumentComplete event occurs. As such, claim 7 is further distinguishable over Biderman.

Claim 8

In relation to claim 8, the Examiner asserts that the feature that the 'HTML document includes a GET or a POST form' is disclosed by Figure 6. As discussed at paragraph 0062, Figure 6 illustrates the graphic user interface for an **applet** downloaded from a webserver. It is not an HTML document. In particular, there is no disclosure of an HTML document including a GET or POST form. Therefore, claim 8 is distinguishable for this additional reason.

Claim 9

In relation to claim 9, the Examiner asserts that the feature of 'the step of detecting submission of a search query to at least one search engine is optionally selectable at the client'. That paragraph discloses that a 'user may use a privacy option when he does not want others to see a specific search and navigation that he had performed, either in whole or in part'. This is different from preventing detecting submission of a search query to at least one search engine being optionally selectable at the client – rather, it appears that in the Biderman citation,

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the information is still collected, but is not displayed to other users, as is evident from the context of that discussion and particularly the preceding paragraphs, which relate to the display of information rather than its collection. Accordingly, claim 9 is further distinguishable.

Claim 16

The Office Action relies upon paragraph [0083] and Figure 2 of Biderman as disclosing the feature added by claim 16. Claim 16 is presently amended. The Applicant asserts that paragraph [0083] merely discloses the host names of various sites accessed by a user. The Applicant further asserts that this is insufficient to disclose a "second disk-based table" that "stores data **characterising** the consecutively accessed pages in each search trail" as required by claim 16. As such, claim 16 as now amended is distinguishable for at least this additional reason.

Claim 17

Claim 17 recites that the number of consecutively accessed pages is limited to a **predetermined** maximum. The Applicant submits that no maximum, let alone a predetermined maximum, is disclosed in Figure 3 of Biderman.

Claim 25

Claim 25 recites limiting the search trails to search trails resulting **search queries from a same user as the received search query**. This feature is not disclosed at paragraphs [0085] to [0087] of Biderman, which clearly show results relating to different users – user2 (paragraph [0086]) and user3 (paragraph [0087]).

This difference highlights an important distinction between claim 25 and Biderman. Biderman is focussed on matching people – it does not teach that anything useful can be accomplished using only one user's data in isolation. This is not so with the present invention as claimed in claim 25. One user's data can be used to tell that user which sites they visited (and in which order) the last time they performed a similar search. Hence, claim 25 is further distinguishable.

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Claims 28 and 29

Claim 28 recites ordering the related search results by one or more ranking criteria. The Examiner refers to paragraph [0084] of Biderman. The table in paragraph [0084] does not show that the results have been ranked, but rather simply shows which sites have been recorded for each of user1, user2, and user3. For similar reasons, the Applicant submits that the feature of claim 29 is not disclosed at paragraph [0084].

Claims 32 and 33

Claim 32 is presently amended and now recites the feature of each search trail including at least one trail step corresponding to two consecutively accessed pages that are accessed by the client via a hyperlink between the pages. For similar reasons to those given above in relation to claim 1, the Applicant asserts that claim 32 is not anticipated by Biderman. Similarly, claim 33 is presently amended to recite a search trail recorder for recording a search trail including at least one trail step corresponding to two consecutively accessed pages that are accessed by the client via a hyperlink between the pages. As such, claim 33 is also distinguishable.

Claims 34, 41, 42, and 45

Claim 34 recites an adapter manager for maintaining an adapter table of known search command formats for a plurality of search engines for identifying one or more search query parameters are entered by a user. This is very different to what is disclosed in paragraphs [0062] and [0063] of Biderman. In those paragraphs, the process described:

   receives a search string entered into a text box (para [0062]); and,

   constructs an appropriate navigation pattern, which includes URL and keywords

This is almost the opposite of the feature recited in claim 34, which includes an adapter table of **known search command formats** for a plurality of search engines **for identifying one or more search query parameters** are entered by a user. For similar reasons, the Applicant asserts that claim 41 is distinguishable over Biderman, at least because it recites a feature of _determining if_

part of the form object matches a known search command format of any of a plurality of search engines. Similar reasoning follows for claim 42, which recites that the search command format includes the network address of a search engine program for executing the search query, and claim 45, which recites periodically validating the search command formats maintained in the adapter table. There is clearly no disclosure of either feature in paragraphs [0062] – [0063] of Biderman.

Claim 47

Claim 47 recites collecting search information identifying a search box page of a search engine; and identifying the search command format from the search information. There is no disclosure of this feature in Biderman at paragraphs [0062]-[0063], nor in Figure 6. The Applicant notes that since the search string is typed into the text box described in the cited paragraphs, the Biderman system would have no need of such a feature. That is, the Biderman system is conceptually very different from the invention claimed in claim 47. The Applicant disagrees with the Examiner's conclusion regarding claim 48 for similar reasons. The Applicant reiterates that Figure 6 illustrates a graphical user interface presented by an applet.

Added Claims

Claims 50 to 53 have been added. Claims 50-53 ultimately depend from claim 1 and are distinguishable over Biderman for at least the reasons previously described in connection with claim 1.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Further, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment in connection with this paper to Deposit Account No. 20-1430.

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If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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